

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
IN CLERKS OFFICE

ANTHONY BAYAD,

Plaintiff,

v.

JOHN CHAMBERS, PATRICIA RUSSO,  
ANTHONY SAVASTANO, and  
CARL WIESE,

Defendants.

2005 FEB 28 P 3:47

U.S. DISTRICT COURT  
DISTRICT OF MASS.  
CIVIL ACTION NO. 04-10468-GAO

**DECLARATION OF CARL WIESE**

I, CARL WIESE, declare under the pains and penalties of perjury, pursuant to 28 U.S.C. § 1746, the following:

1. I am the Area Vice President for Advanced Technology with Cisco Systems, Inc. ("Cisco"). I have worked at Cisco at its Edison, New Jersey facility since August 27, 2002.
2. I submit this declaration in support of the Motion for Summary Judgment of myself, John Chambers and Anthony Savastano in connection with the captioned matter.
3. I had no involvement with and have no personal knowledge of the facts surrounding Anthony Bayad's employment with Cisco. I was not aware that Mr. Bayad had worked at Cisco until after he filed this lawsuit in 2004.
4. As I understand Mr. Bayad's allegations, Cisco terminated his employment in May 2001, more than a year before I began work at Cisco.

5. Although I knew Mr. Bayad when we both worked at Lucent in 1997, I did not interact in any way with Mr. Bayad during the period of his employment with Cisco or at any time thereafter.

6. I have no personal knowledge concerning, and have had no involvement with, any decision regarding Mr. Bayad's employment with Cisco, the termination of his employment, or Mr. Bayad's alleged subsequent attempts to obtain re-employment with Cisco or employment elsewhere.


7. I have no involvement with the administering or scoring of Cisco Certified Internetworking Engineer ("CCIE") certifications.

8. To my knowledge, Cisco does not maintain a no-hire list targeting minorities as alleged by Mr. Bayad.

9. I have no personal knowledge concerning, and have had no involvement with, any decision regarding Mr. Bayad's alleged attempts to foster any type of business relationship with Cisco or any other entity, on behalf of himself or any affiliated entity.

10. I have never communicated with John Chambers about Mr. Bayad. Since 1997, I have had no communications with Anthony Savastano about Mr. Bayad.

February 15, 2005

  
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Carl Wiese